

## **4.8 AGRICULTURAL RESOURCES**

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The purpose of this section is to describe the existing and future agricultural resources in the vicinity of the Gregory Canyon Landfill project and to identify any specific agricultural resource impacts that are likely to result from project implementation. Agricultural resources are assessed on the basis of existing agricultural resources and applicable policies.

### **4.8.1 EXISTING SETTING**

#### **4.8.1.1 On-Site Agricultural Land Uses**

The Gregory Canyon Landfill property consists of 1,770 acres of primarily undeveloped or vacant land. Gregory Canyon, as well as existing on-site and off-site agricultural operations, are visible on the site aerial photograph (Exhibit 4.1-1). Agricultural land refers to areas supporting active agricultural cultivation or cattle grazing. As indicated in Section 4.9 (Biological Resources), a total of 78.7 acres of agricultural land, primarily grazing areas, exist on the project site. The dairies on the project site, which are also considered agricultural lands, were mapped as a combination of agricultural land and developed land and occupy 88.3 acres.

Two dairies (Lucio and Verboom dairies) have operated on land within the project site for a number of years. The abandoned Lucio Family Dairy, which closed in 1986, is located north of the San Luis Rey River, and south of SR 76. It was closed and rendered inoperable by the owner before purchase options of the property were obtained by the project applicant.

The Pete Verboom Dairy exists to the west of the Lucio Dairy and is adjacent to and south of SR 76. Existing land uses within this general area include a pear orchard, pastures, various farm outbuildings, and dirt access roads along fields. Pastures and a hay shed are situated on the valley floor on the south side of the river. The Verboom Dairy currently operates on a temporary lease from the property owner; however, the dairy is expected to close at the time of project construction.

#### **4.8.1.2 Off-Site Agricultural Land Uses**

As indicated in Section 4.1, Land Use and Related Planning, a substantial portion of the land surrounding the project site consists of open space and agriculture (i.e., orchards, fields, and grazing). Land north of SR 76 between I-15 and Monserate Mountain consists primarily of abandoned pastures and citrus groves. There are citrus groves adjacent to and south of the highway to the east past Pankey Road, near the base of Monserate Mountain on the north side of the road, and on the river valley floor to the north of Gregory Canyon.

Several agricultural uses are situated within close proximity of the project site. On an annual basis, the surrounding agricultural operations contribute substantially to California's economy. The Hodge Brothers farm occupies most of the relatively flat canyon floor to the east of Rice Canyon Road west of the project site. This operation is primarily devoted to truck crops. Some avocado groves exist to the east. Pala Rey Ranch lies adjacent to the western boundary of the site, south of SR 76 and on both sides of Couser Canyon Road. The ranch headquarters, surrounded by a pasture holding beef cattle and a citrus grove, is located west of Couser Canyon Road near the mouth of Couser Canyon. Truck crops are grown on the river valley floor. The small roadside Pala Rey Ranch Produce Stand is located on the south side of SR 76 just east of

Couser Canyon Road. The San Luis Rey Ranch is located to the east and west of Couser Canyon Road. Pankey Ranch is located on the south side of SR 76 approximately three-fourths of a mile west of the project site. Pankey Ranch consists primarily of citrus operations.

The area south of the project site is a rural residential area with numerous homes on large parcels. The steep canyon slopes are almost entirely covered with fruit tree groves, primarily avocados. Both avocados and citrus are grown along the southern boundary of Gregory Canyon.

#### **4.8.1.3 Agricultural Preserves**

##### Williamson Act

The California Land Conservation Act of 1965, or Williamson Act, authorizes the County to establish agricultural preserves. As stated in County of San Diego Policy No. I-38, an agricultural preserve is an area *“devoted to either agricultural use, open space use, recreational use, or any combination of such uses, and compatible uses which are designated by the County.”* The preserves define boundaries of areas within the County whose owners are willing to enter into contracts pursuant to the Act. Landowners within a preserve may enter into a contract with the County to restrict their land to the uses stated above making the assessment on their land based on the restricted use rather than on the market value. The preserve may contain land other than agricultural land, but the use of any land in the preserve and not under contract must be restricted by zoning or other suitable means in such a way as not to be incompatible with agricultural use of the land. The governing jurisdiction must also adopt rules governing the administration of the preserves.

The Williamson Act is based on numerous State legislative findings regarding the importance of agricultural lands in an urbanizing society, among them the findings that agricultural lands have a definite public value as open space for the purposes of aesthetic value and wildlife habitat enhancement. Policies emanating from those findings include those that discourage premature and unnecessary conversion of agricultural land to urban uses and discourage discontinuous urban development patterns which unnecessarily increase the costs of community services to community residents.

The Pala agricultural preserve number 15 on the site was established by resolution in December 1971. However, no agricultural preserve contracts were ever signed for the project site. A review of assessor’s parcel maps and San Diego Association of Governments (SANDAG) Geographic Information System (GIS) data indicates that no agricultural contract lands exist on the project site at this time.

Adjacent parcels under contracts are located to the northwest in Rice Canyon to the southwest in Couser Canyon, and to the northeast in the valley north of SR 76 and at the base of Gregory Mountain. Surrounding preserve lands within about a half-mile of the project site total approximately 1,220 acres, 845 acres (69 percent) of which are under contract.

No portion of the project site is currently under either a Land Conservation Act Contract or in an agricultural preserve. Proposition C amended the County general plan land use designations, zoning, and other ordinances, rules and regulations pertaining to the site to a landfill classification, and no agricultural preserve established pursuant to the Land Conservation Act remains on the project site. However, adjacent Williamson Act preserves and agricultural contract lands remain unaffected by the Proposition C land use changes on the project property.

#### **4.8.1.4 Agricultural Soils**

##### Soil Capability Classification Systems

The U.S. Department of Agriculture Soil Conservation Service (SCS) has developed a nomenclature system that generally describes soil types, their physical characteristics and limitations, and their suitability for agriculture and other uses. Capability groupings are used by the SCS to group soils according to their general suitability for most kinds of field crops. In the capability system, all kinds of soils are grouped at three levels: the capability class, subclass, and unit. Capability classes are designated by Roman numerals I through VIII and they indicate progressively greater limitations and narrower choices for practical use. For instance, Class I soils have few limitations that restrict their use, whereas Class VIII soils and landforms have limitations that preclude their use for commercial agriculture and restrict their use to recreation, wildlife, water supply or aesthetic purposes.

The capability subclasses, of which there are four, represent further limitations on the use of the soil resources of a given area. Such limitations include the risk of erosion, extensive soil wetness, and climatic limitations which affect the suitability of the soil for agricultural uses. The Class I soils on the project site, however, have no subclasses since, by definition, they have few limitations to their use.

Capability units are soil groups within the subclasses which further define soils characteristics and/or limitations to their use. Again, the on-site Class I soils do not exhibit these limitations and, in general, soils in capability groups I and II are classified as “prime” soils. Prime soils, as defined by the Williamson Act, are soils that are in capability classes I and II or produce \$200 or more gross annual income three years out of five. There are about 26,700 acres of Class I and 104,930 acres of Class II soils in San Diego County.

Another general indicator of the agricultural value of soils is the Storie Index. The Storie Index expresses numerically the relative degree of suitability, or grade, of a soil for intensive agriculture based on soils characteristics. Soils of grade 1 (i.e., Index rating of 80 to 100) have few or no limitations restricting their use for crops, whereas at the other end of the scale, grade 6 (i.e., Index rating of less than ten) consists of soils that generally are not suited to farming. All six Storie index rating grades are represented on the project site. However, the only grade 1 soils are the Visalia loam units that are also classified as prime due to their Class I and II designations (Table 4.8-1).

##### On-Site Soils

Three soil associations are present in and surrounding the San Luis Rey River Valley between I-15 and the Pala Townsite. Soils on the valley floor are of the Visalia-Tujunga Association. Upland soils are of the Cieneba-Fallbrook and Las Posas Associations. The on-site soils and their associated acreages on the project site are shown on Table 4.8-1.

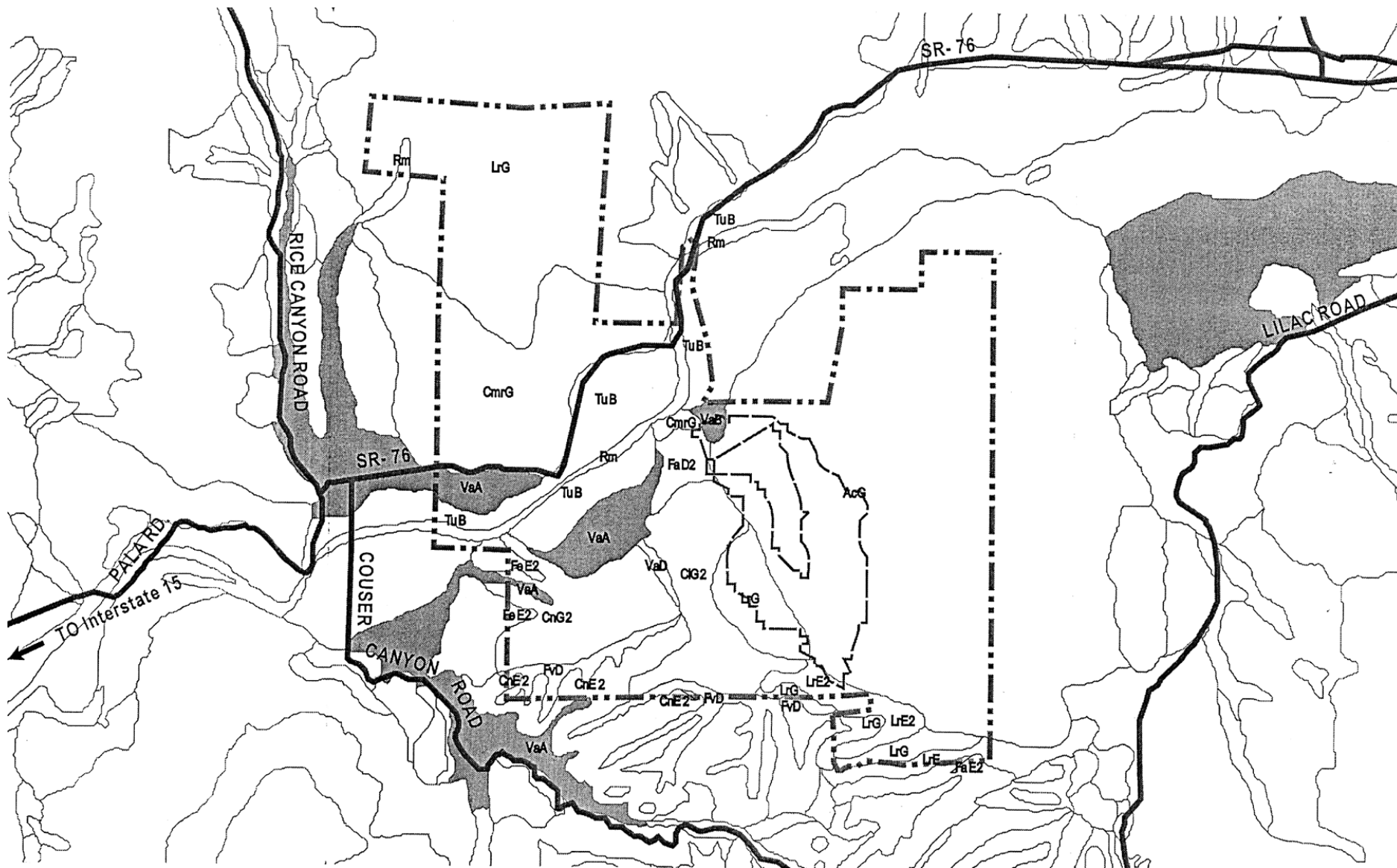
**TABLE 4.8-1  
ON-SITE SOIL RESOURCES**

SOIL TYPE	DESCRIPTION	EXISTING ACREAGE
AcG	Acid igneous rock land	657.4
LrG	Las Posas stony fine sandy loam, 30 to 65 percent slopes	341.8
CmrG	Cieneba very rocky coarse sandy loam, 30 to 75 percent slopes	192.2
TuB	Tujunga sand, 0 to 5 percent slopes	147.1
CIG2	Cieneba coarse sandy loam, 30 to 65 percent slopes, eroded	109.4
CnG2	Cieneba-Fallbrook rocky sandy loam, 30 to 65 percent slopes	94.5
VaA <sup>a</sup>	Visalia sandy loam, 0 to 2 percent slopes	69.0
CnE2	Cieneba-Fallbrook rocky sandy loam, 9 to 30 percent slopes	36.5
LrE2	Las Posas stony fine sandy loam, 9 to 30 percent slopes, eroded	30.6
Rm	Riverwash	28.1
FvD	Fallbrook-Vista sandy loam, 9 to 15 percent slopes	26.4
FaD2	Fallbrook sandy loam, 9 to 15 percent slopes, eroded	22.5
FeE2	Fallbrook sandy loam, 15 to 30 percent slopes, eroded	9.0
LrE	Las Posas stony fine sandy loam, 9 to 30 percent slopes	7.2
VaB <sup>b</sup>	Visalia sandy loam, 2 to 5 percent slopes	6.8
VaD	Visalia sandy loam, 9 to 15 percent slopes	4.8
VsD2	Vista coarse sandy loam, 9 to 15 percent slopes, eroded	0.2
<b>TOTAL</b>		1,783.5 <sup>c</sup>
<sup>a</sup> Indicates Class I (prime) agricultural soil.		
<sup>b</sup> Indicates Class II (prime) agricultural soil.		
<sup>c</sup> Total acreage includes approximately 13 acres owned by SDG&E within the site boundary.		
Source: SANDAG GIS Data, 1997		

As indicated in Table 4.8-1 and illustrated on Exhibit 4.8-1, soils on the project site are diverse as to capability unit and crop suitability. Of the eight capability classes, Classes III and V are absent from the landfill site. SANDAG GIS soils data shows that there are roughly 69 acres of Class I and 7 acres of Class II soils on the property; both classes are prime agricultural soils. On the project site, there are an estimated 600 arable acres with soils suitable for one or more of the five major crops present. Distribution and areal extent is primarily determined by underlying geologic formations and topography. The western slopes of Gregory Canyon at the landfill site and the mountain above are made up of acid igneous rock (AcG). This soil is in Class VIII, with a steep landform ordinarily precluding commercial crop production, and not considered arable.

The eastern slope of Gregory Canyon is mostly Las Posas loam (LrG) in Class VII, with very severe limitations making them generally unsuited to cultivation. This soil is not considered arable. The remainder of the eastern canyon slope is Cieneba loam (CIG2) which is in Class VII, but suitable (fair) for avocados. The location of the landfill support facilities is Fallbrook loam (FaD2) in Class IV with severe limitations that reduce the choice of crops, but suitable (fair) for avocados, citrus, tomatoes, and flowers. This is the only area at the landfill and support facilities site which has been farmed, either in field crops or used as pasture, in the past.

The San Luis Rey River Valley floor on both sides of the river is almost entirely Tujunga sand (TuB) and Visalia loam (VaA). Tujunga sand (TuB) is in Class IV, but suitable (good) for avocados and flowers as well as suitable (fair) for truck crops. Visalia loam (VaA) is in Class I, a prime soil suitable (good) for avocados, citrus, truck crops, and flowers as well as suitable (fair)



NOT TO SCALE

Sources: SANDAG GIS Data, 1997; David Evans and Associates Inc., 1999

Exhibit 4.8-1  
Agricultural Soil Types

for tomatoes. There is a pocket of Visalia loam (VaB) near the mouth of Gregory Canyon. This soil is Class II, which is also a prime soil suitable for all five major crops. Some Fallbrook loam (FeE2) is located on uplands at the toe of the ridge system along the western boundary. The knoll near the landfill support facilities location is Cieneba loam (CmrG). Soils on the valley floor have been cultivated in the past for field crops, as well as used for pasture or dairy feed lots.

High ground north of SR 76 is evenly split between Cieneba loam (CmrG) and Las Posas loam (LrG). Both soils are in Class VII, with very severe limitations making them unsuited to cultivation. These soils are not considered arable.

## **4.8.2 IMPACT SIGNIFICANCE CRITERIA**

Impacts to agricultural uses are considered significant if the proposed project:

- is incompatible with surrounding agricultural operations, particularly those on properties under a Land Conservation Act Contract, or
- converts or impairs the productivity of substantial areas of prime agricultural land.

## **4.8.3 POTENTIAL IMPACTS**

Landfill operations have the potential to cause adverse impacts to agriculture by retiring existing uses, precluding future uses, causing loss of suitable soils, and impacting off-site operations in various ways. The following sections address potential effects related to existing dairy and active cultivation operations and agricultural soils.

### **4.8.3.1 Short-Term (Construction) Impacts**

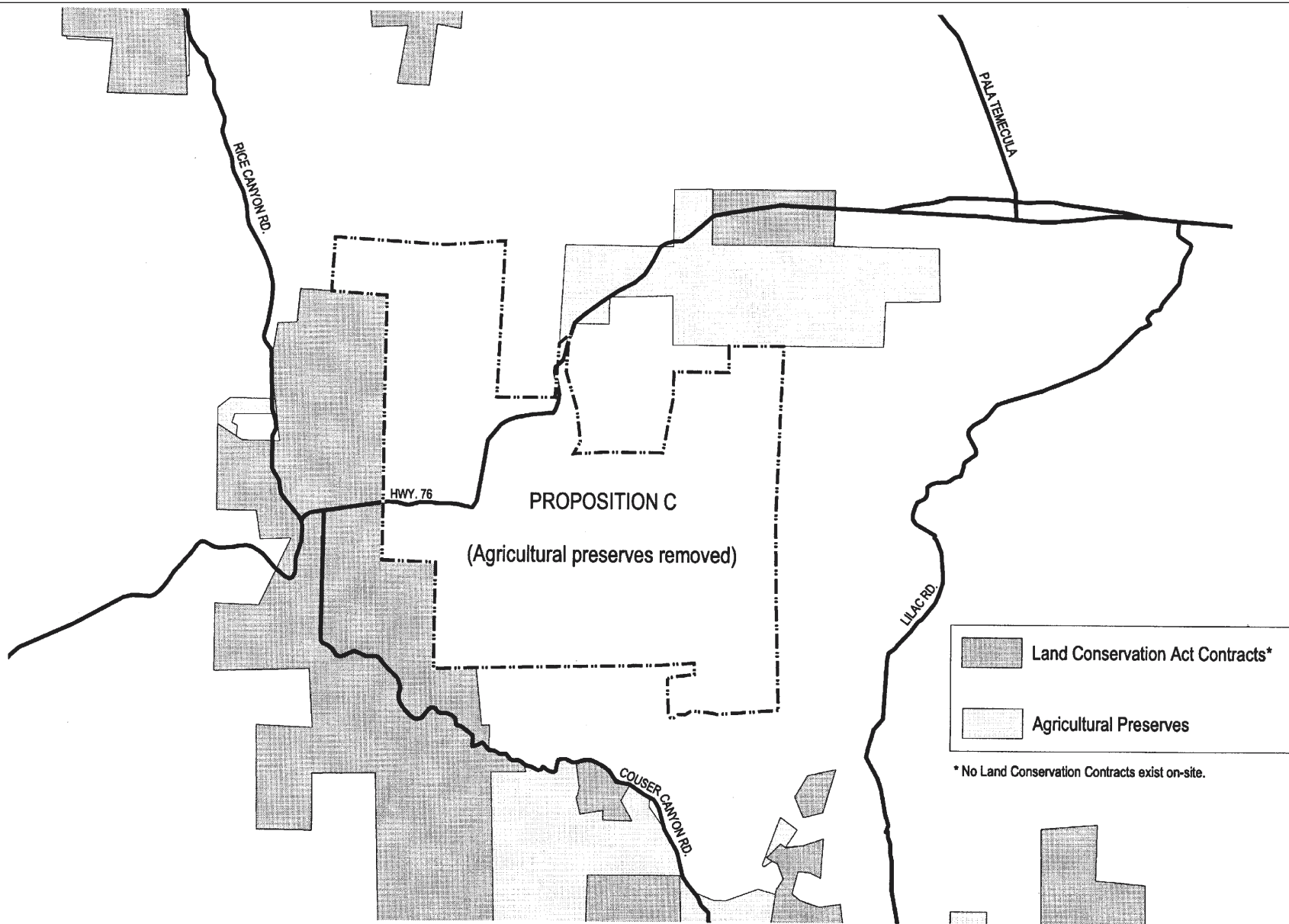
The loss of agricultural soils in the landfill footprint area is an immediate impact resulting directly from grading and excavation activities. However, those impacts bear long-term consequences, which are more appropriately analyzed in Section 4.8.3.2—Long-Term (Operational) Impacts. Since many of the construction-related effects on surrounding agricultural uses are similar to those that will occur during the operational phase of the project, those impacts are also analyzed in the following section.

### **4.8.3.2 Long-Term (Operational) Impacts**

#### Agricultural Use Compatibility

The analysis of land use compatibility recognizes distance as an important factor in reducing potential landfill impacts to a less than significant level. Similarly, proximity to landfill activities could affect the productivity of agricultural operations. Landfill construction and operation adjacent to existing Williamson Act contract lands (Exhibit 4.8-2) raises an issue regarding the compatibility of the project with those agricultural operations that the contracts are intended to perpetuate.

At its nearest point, the landfill footprint and the extent of operations will be approximately 3,300 feet (0.6 miles) from the nearest agricultural contract lands adjacent to the project site's western property line. However, the Borrow/Stockpile Area A is within 100 feet of those same contract lands. Although distance and topographic barriers may not provide effective separation between the landfill operations and nearby agricultural uses, Pala Rey Ranch, San Luis Rey Ranch, and Pankey Ranch, the dust impact analysis below indicates little potential for



Sources: SANDAG GIS Data, 1997; David Evans and Associates Inc., 1999

Exhibit 4.8-2  
Agricultural Preserves  
and Contract Lands

incompatibility between the landfill and agricultural contract lands to the west. The Borrow/Stockpile Area would be used during initial construction and then revegetated and not used until about year 25.

Distance and topographic barriers would, however, result in effective separation between the landfill and nearby agricultural contract lands in Couser Canyon, to the south of the project site. The Borrow/Stockpile Area B is approximately 1,000 feet (0.2 miles) from agricultural contract lands in Couser Canyon and the landfill footprint is over 3,000 feet (0.6 miles) distant.

Project implementation would require considerable earthwork. Several potential effects can result from the generation of dust during construction and operation of the proposed landfill project. Areas immediately west and south of the site are extensively cultivated for agriculture, including the Pala Rey Ranch, San Luis Rey Ranch and Pankey Ranch. Dust generated on the landfill site could become airborne and fall out on nearby crops. Dust accumulation can reduce photosynthesis, and create insect and disease related problems, which can reduce crop yields and contribute to insect problems. Dust has been shown to interfere with the activities of parasitic and predaceous insects. On occasion, this interference has resulted in an outbreak of insect and mite problems.

Particularly in the avocado groves in the project vicinity, dust poses a threat to the continued effectiveness of bees that are used as pollinators for agricultural crops. The use of pesticides to control harmful insects has also reduced the population of beneficial insects such as pollinators. Thus, fruit and seed growers contract with beekeepers to move honeybee colonies onto the farms. Airborne dust generated during site excavation and landfill operation activities could also cause bees to leave the affected areas, including those avocado groves for which farmers have paid for bee pollination services.

A detailed analysis of dust and PM<sub>10</sub> generation is provided in Section 4.7, Air Quality and Air Toxics Health Risks. Exhibits 4.7-1 and 4.7-2 provide regional and site specific wind flow information. The local canyon topography orients the regional west/east wind pattern into a northwest/south airflow. While winds could transport dust north, south, or west of the site, winds to the west are rare. In addition, winds from the north occur primarily at night, when dust generating landfill activities would not occur. Furthermore, dust particles generally consist of inert silicates that have little effect other than a soiling nuisance. No chemical constituents with the potential to affect plant material and pollinating insects will be present in dust transported off-site. With implementation of project design features to control dust, and the proposed distances from the landfill operations to the adjacent agricultural uses, the project would be compatible with ongoing agriculture on surrounding properties. Therefore, impacts from fugitive dust are not considered significant to agricultural resources.

In addition to dust and particulate matter, the landfill would alter the landform on the site, causing a potential for microclimate changes in the area. However, because the size of the landfill (307 acres) compared to the overall basin floor of the canyon (12,000 acres) is fractional (2.6 percent) when compared to the volume and movement of air down into the valley no significant change in temperature is expected. The expected temperature change would be a drop of 0.18 degrees Fahrenheit (see Section 4.7, Air Quality and Air Toxics Health Risk). The avocado and citrus orchards surrounding the site would not be affected by this change.



### Dairy Operations

As noted previously, the Lucio Family Dairy ceased operations and went out of business around 1986. The existing dwellings and other dairy buildings would be demolished prior to or during initial construction of the project. Since the dairy was closed and rendered inoperable by the owner before purchase options of the property were obtained by Gregory Canyon Ltd., the project would not have an impact on the Lucio Dairy parcels.

In contrast, Pete Verboom's Dairy is currently in operation. The Verboom family and their employees, or other tenants occupy residences on the land. The purchase option agreement on the Verboom parcels indicates that the former owner could reside there until the project is under construction. Pete Verboom has indicated that the Verboom Dairy and employees will relocate to Orland, California when operations cease within the Pauma region. All buildings would be demolished and all equipment taken from the land. Sale of the parcels to the applicant and closure of the dairy was a voluntary business decision by Verboom rather than a result of the project. Therefore, this is not considered to be a project-related impact. In addition, plans to relocate the Verboom Dairy to Orland will cause no net loss of existing dairy operations.

### On-Site Agricultural Resources

The applicant does not currently intend to utilize the property for agricultural purposes. While a large portion of the project site will be dedicated as open space, most of that acreage will be set aside as habitat preserve in which agriculture would not be a compatible use. For the purposes of this analysis, a "worst case" scenario is examined, in which all prime agricultural soils are lost.

Topsoil at the landfill footprint would be removed and stockpiled for later use on the site, but not considered available to agriculture upon closure. Soils in the support facilities area would be removed and/or compacted. Approximately 57 acres of Cieneba loam (CIG2) in the landfill footprint and upper stockpile areas are considered arable. Although in Class VII, this soil is rated fair for avocados. Acid igneous rock (AcG) comprises the majority of the soil encompassed by the footprint, facilities, and stockpile areas; to a lesser degree, Las Posas loam (LrG and LrE2) is also present along the western limits of the footprint.

Of greatest concern is the loss of prime agricultural soils, of which 69 acres of Class I and seven acres of Class II soils exist on the project site. The construction of the landfill, support facilities, access road improvements, and borrow/stockpile areas will result in the disturbance or removal of approximately 4.8 acres of Class I VaA (Visalia sandy loam, 0-2 percent slopes) and 2.6 acres of Class II VaB (Visalia sandy loam, 2-5 percent slopes) soils, or a total of approximately 7.4 acres of prime agricultural land. The remaining approximately 64.2 acres of Class I VaA and 4.2 acres of Class II VaB, or a total of approximately 68.4 acres of prime agricultural land lies within the open space portions of the project site. The two types of Visalia loam on the project site differ in their slope conditions, yet both are considered prime soils suitable for all major crops.

Appendix G of the State CEQA Guidelines attributes significance to a project that would "convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land." However, several factors serve to mitigate the potential for significant impacts to prime agricultural soils on the project site. First, the on-site prime agricultural soils are not currently being used for active cultivation; they are used for grazing purposes or are vacant. The two largest areas of prime soil disturbance are at the support facilities area (2.6 acres) and at the lower borrow/stockpile area (3.9 acres) in the southwest

portion of the site. In the case of the 6.8-acre VaB (Class II) soil unit, of which 2.6 acres are impacted in the facilities area, that land is physically separated by 0.16 miles from any other prime soils unit and approximately 0.9 miles from any other areas under active cultivation. Adjacent soil units are in capability classes IV (TuB and FaD2), VII (CmrG), and VIII (AcG), indicating that the 6.8-acre VaB soil unit is somewhat isolated from other sizable, viably cultivated agricultural soils. Similarly, the 3.9 acres of VaA (Class I) soils at the site's southwestern boundary are surrounded by lesser quality Class VI soil types, again suggesting that its current non-agricultural state is at least in part due to its isolation from larger, contiguous areas of arable agricultural soils. At the site's western boundary, within the footprint of the lower borrow/stockpile area, the majority of the disturbed VaA soils are a part of a larger 106-acre VaA soil unit that extends approximately one-half mile south of the site boundary and within which active cultivation occurs outside the project site. Therefore, prime agricultural soils disturbed as a result of project implementation are somewhat limited in terms of their suitability for economically viable future cultivation. Surrounding soil characteristics and the isolated nature of impacted prime soils on the project site contribute to the determination that impacts to Class I and II soils are less than significant.

Another consideration with respect to prime agricultural soils is the disturbance area of such soils as compared to local and regional inventories of similar soil resources. Within a two-mile radius of the project site, approximately 1,280 acres of prime agricultural soils are present; on-site disturbance areas constitute about six percent of the larger area total. As indicated previously, there are about 26,700 acres of Class I and 104,930 acres of Class II soils in San Diego County. The impacted prime soils units on the project site comprise only 0.06 percent of the County's current inventory. Both locally and regionally, prime agricultural soils are available in sufficient quantity to determine that the loss of the 76 acres of on-site prime soil resources will result in a less than significant impact. Large contiguous areas of prime soils would remain available for cultivation in the project vicinity and regionally.

The County of San Diego in its *Guidelines for the Implementation of CEQA* (1991) has developed a means by which to evaluate the significance of agricultural soils impacts. As suggested by the California Department of Food and Agriculture, the County's requirements for the assessment of projects in areas of prime agricultural land include an assessment of on-site agricultural resources, Williamson Act contract or preserve status, potential land use conflicts, and agricultural land value.

The County's methodology for determining agricultural land value requires an analysis of eight weighted components based on their estimated resource value. Totaling the weighted values of the on-site agricultural resources results in a numerical summary of the project's impact on agricultural land value. The eight criteria aimed at determining agricultural land value are listed and described below. The range of possible values assigned to each criterion is in parentheses, with the lower values indicating fewer impacts and higher values indicating more adverse impacts.

1. *Assessors parcel size (0-15)*: The total disturbance area associated with the landfill project will be approximately 411 acres. Site rating is 10.

2. *Soil Conservation Service Soil Classification (0-15)*: Over 95 percent (1,708 acres) of the project site is Class VI, VII, or VIII soil. The weighted average of on-site soils is Class VII.<sup>1</sup> Site rating is 5.
3. *Water Availability (0-15)*: The on-site arable land has adequate water supply suitable for crops or grazing. Site rating is 14.
4. *Crop Suitability (0-10)*: Given the predominant range of soil classes on the site, the on-site soils are moderately suitable for irrigated crops, orchard, or ornamentals. Site rating is 4.
5. *Existing Land Use (0-5)*: Existing land uses in the disturbance areas of the project site are mostly vacant with moderate agricultural potential. Site rating is 2.
6. *Adjacent Land Uses (0-10)*: The project site is surrounded by agriculture, residences, open space, and limited aggregate mining. Site rating is 8.
7. *Agricultural Preserve Potential (0-5)*: Proposition C amended the land use designations and zoning on the site to a landfill classification; no General Plan or zoning agricultural designations exist on the project site. No portion of the project site can be considered for an agricultural preserve designation. Site rating is 0.
8. *Economic Viability (0-10)*: The closure of the Verboom and Lucio dairies has occurred independently of and not as a result of the proposed project. Given existing agricultural soils conditions, and without specific data on potential crop yields and expenses, it can only be assumed that portions of the site are potentially viable. Site rating is 4.

The composite score for the project site is 47, which is lower than the threshold figure of 55 to 60 used in the County's CEQA Guidelines for the determination of potential agricultural impact significance. In applying the County's analysis criteria to the potential effects of the project, particularly the methodology for determining agricultural land value, it can be seen that the threshold for significant agricultural impacts is not exceeded.

The County's CEQA Guidelines also qualify the agricultural impact assessment criteria by stating that they apply to instances in which "*the project is located in an area of prime agricultural land, and implementation of the project may result in a substantial loss of this valuable resource*" (emphasis added). The County's analysis criteria indicate that the loss of 76 acres of non-contiguous prime agricultural land is an adverse impact, yet less than significant. Additionally, the long- and short-term impacts of agricultural land conversion on the project site are less than significant, particularly given the preservation of 1,313 acres of on-site open space in perpetuity, which will ensure the compatibility of the landfill and surrounding agricultural operations.

#### 4.8.3.3 Site Closure Impacts

Upon closure the entire site would be undeveloped open space. While there would be on-site activity for ongoing monitoring, such as groundwater monitoring to ensure the continued protection of groundwater, the level of activity at the site is expected to be substantially reduced. The use of the site as open space would not impact adjacent agricultural uses.

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<sup>1</sup> A weight of one through eight was assigned to soil classes VIII through I, respectively. The acreage of the on-site soils in each class was multiplied by the weighting factor, and the results were added together. This sum was divided by the total site acreage. The result was 2, so the weighted average soil classification for the project site is Class VII.

#### **4.8.3.4 First San Diego Aqueduct Relocation Option**

Relocation of the First San Diego Aqueduct would not alter the impact to agricultural resources already analyzed for the proposed project. Relocation of the aqueduct would not disturb any additional prime agricultural land, and the short-term construction impacts would not impact other agricultural operations in the area. Therefore, relocation of the aqueduct would not result in significant impacts to agricultural resources.

#### **4.8.4 MITIGATION MEASURES AND PROJECT DESIGN FEATURES**

##### Project Design Features

Project design features to minimize fugitive dust will reduce potential impacts to agricultural resources (Section 4.7, Air Quality and Air Toxics Health Risks).

##### Impacts and Mitigation

Since no significant adverse impacts related to agricultural resources were identified, no mitigation measures are necessary.

#### **4.8.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION**

No mitigation measures are necessary, therefore, impacts are considered less than significant.